STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

FILED

AUG 02 2002

INDIANA UTILITY REGULATORY COMMISSION

In the Matter of the Petition of Indiana Bell Telephone Company, Incorporated d/b/a Ameritech Indiana Pursuant to I.C. 8-1-2-61 For a Three Phase Process For Commission Review of Various Submissions of Ameritech Indiana to Show Compliance with Section 271(c) of The Telecommunications Act of 1996	)	**Cause No. 41657**

TIME WARNER TELECOM OF INDIANA, L.P.'S and WORLDCOM, INC.'S COMMENTS ON REVISIONS TO ILLINOIS REMEDY PLAN TO INCLUDE SPECIAL ACCESS IN ACCORD WITH IURC'S PRINCIPLE NO. 7

Time Warner Telecom of Indiana, L.P. ("Time Warner Telecom") and Worldcom, Inc. ("Worldcom") file these comments to address, in particular, Principle No. 7 as set forth in the Commission's September 11, 2001 Order in this cause. Time Warner Telecom and Worldcom join in, and fully support, the comments filed by Joint CLECs currently herewith, and recommends that in addition to those comments, that the remedy plan includes performance metrics and associated penalties for special access services. [1]

Principal No. 7: Neutrality with Respect to Mode of Entry

In the Commission's November 9, 2000 order in this cause, the Commission outlined 44 elements to be included in the remedy plan (44 Principles). In its September 11, 2001 order, the Commission explained that these principles are essential to ensure

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[1] WorldCom's support of these comments is limited, at this time, to the recommendation that the Commission adopt the JCIG proposal.

the plan is designed to provide incentives to Ameritech to reach and maintain compliance with state-approved standards governing its performance toward CLECs; to provide a fair and reasonable framework for compensating individual CLECs that are harmed when Ameritech does not reach and maintain those standards; and to help facilitate the development of more robust competition. (Sept. 11, 2001 Order, page 3).

Principal No. 7, as outlined by the Commission in the September 11, 2001 Order, provides that:

> The remedy plan will treat the selection of PMs and the weight of the PMs, in such a way as to maintain neutrality with respect to mode of entry (resale, UNEs, interconnection, collocation, and other non-UNE facilities). If a mode of entry is not represented in the set of PMs then anti-competitive behavior with respect to that mode of entry might not be detected. Similarly, the way the PMs are weighted and the way their populations are sampled should be structured to not discriminate against a mode of entry.

The Commission gave further guidance to parties as to the application of Principle No. 7, advising parties that:

> The Commission is leaning toward requiring SBC/Ameritech to develop performance measurements and business rules (and, perhaps, penalties and remedies) for special access to include in the Indiana Remedy Plan. However, the Commission does not have enough information to reach a final decision. Parties are required to discuss, at a minimum: (1) issues pertaining to Ameritech's performance in providing special access to CLECs, (2) appropriate performance measures and business rules, and (3) appropriate remedies and penalties for missing those standards. In addition, CLECs should be prepared to discuss specific concerns or complaints regarding Ameritech's allegedly poor performance. SBC/Ameritech, in turn, should be prepared to discuss specific ways of resolving those concerns or complaints. The Commission will consider the results of these discussions in deciding whether to formally require the development and implementation of performance standards for SBC/Ameritech's provision[2] of special

[2] The word "provision" is used very broadly in this sentence.

access and remedies for poor performance associated with such provision.

Industry Supported Comprehensive Special Access Metrics and Standards are Needed to Assess ILEC Performance

On February 7, 2001, Time Warner Telecom filed testimony in this docket, outlining the issues and problems Time Warner Telecom is experiencing with Ameritech's quality of service relating to special access services. Since then, Time Warner Telecom, Worldcom and other interested parties, have continued to discuss the need for special access performance measures and improved performance with Ameritech, without reaching an acceptable accord.

In its February 2001 filing, TWTC stated that Ameritech voluntarily makes available limited self-reported metrics that largely address provisioning and maintenance. On the surface, it may seem that Ameritech is making available several self-reported metrics to assess the quality of special access service. However, a careful examination of this self-reported information reveals that key areas of service delivery such as FOCs received on time and circuits past due are not included.

The issue regarding which aspects of special access service delivery has also been debated between CLECs and Ameritech during this proceeding without reaching a consensus. Although TWTC provided input concerning this question as part of earlier filings, a consensus was never reached largely due to Ameritech's repeated assertions that the issue of special access service delivery did not belong as a subject to be discussed during this proceeding.

However, to address the question concerning the appropriate aspects of special access service delivery that should be measured, a diverse group of CLECs and Carriers

calling themselves The Joint Competitive Industry Group ("JCIG"), joined together in December 2001 to develop a comprehensive set of 11 metrics with corresponding levels of product disaggregation, performance standards, and reporting dimensions for special access.[3] The output of that collaborative effort by competitive entrants produced a document known as the JCIG proposal, which was filed with the FCC on January 22, 2002 in response to its Notice of Proposed Rule Making regarding the need to adopt national metrics and standards governing special access service delivery by the ILECs.[4] The JCIG proposal provides broad consensus among the competitive entrants regarding special access metrics and standards, and lays to rest the question regarding what needs to be measured, what standards should apply, the level of product disaggregation, and the overall reporting dimensions. As charter members of the Joint Competitive Industry Group, TWTC and Worldcom fully endorse the JCIG proposal, and encourage the IURC to consider this model for assessing the quality of special access service delivery by Ameritech.

CLECs Have Not Been Successful in Achieving a Negotiated Solution for Special Access

Ameritech has repeatedly asserted in this Docket that it will address CLECs need to special access reporting data in business-to-business negotiation, asserting that there is no need for regulatory action. However, TWTC's and Worldcom's (and CLECs') experience has proven otherwise. As the record will note, TWTC fully cooperated during

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[3] See letter to FCC Chairman Michael Powell attached hereto as Exhibit 1.

[4] See JCIG proposal filed with FCC attached hereto as Exhibit 2.

the 271 collaborative process and agreed to take its request for inclusion of Commission ordered special access reporting off the table as part of the remedy plan settlement discussions. It was further agreed to initiate negotiations between Ameritech and any interested CLEC concerning the matter of special access reporting based on the JCIG proposal using a separate, but parallel track from the remedy settlement discussions. Unfortunately, only minimal progress was made. After several meetings the parties reached an impasse, and further negotiation did not result in an agreement being reached.[5] Of the many issues CLECs discussed during their attempts to negotiate with Ameritech on the JCIG proposal, was the requirement for Ameritech to provide aggregate reporting for all carriers. This requirement is essential so that CLECs can assess Ameritech's overall performance as well as performance to the particular CLEC, as outlined in the JCIG proposal. Ameritech refused to consider this matter and this issue remains a key obstacle in reaching a negotiated agreement. The lack of carrier aggregate reporting by Ameritech for special access service delivery will impair the CLECs ability to detect disparate treatment by Ameritech. Unless ordered by this Commission to implement special access metrics, standards, and reporting as documented in the JCIG proposal, Ameritech continues to have little or no incentive to reach a negotiated agreement.

Given the increase in the level of local market competition and the diverse nature of the traffic supported by special access facilities, Time Warner Telecom and Worldcom find SBC/Ameritech's available special access reporting metrics insufficient

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[5] See the SBC/Ameritech Special Access Service Objectives ("SASO") proposal v1.3 that SBC proposed, attached hereto as Exhibit 3.

to support a "level" playing field, and to ensure robust competition when CLECs choose this mode of market entry.

Ameritech's Special Access Service Delivery is Sub-Standard

Although Ameritech does self-report limited special access performance metrics, it considers this information to be proprietary.[6] However, Ameritech's average aggregate performance towards meeting the combined T1/DS1 Customer Desired Due Date for installations during the months January 2002 through May reflects a dismal 69.97% on-time performance. This performance is approximately 20% below Ameritech's stated internal performance objective. Furthermore, Ameritech's average aggregate performance towards meeting the combined T3/DS3/OCn Customer Desired Due Date for on-time installations during the same period is only slightly better at 88.09%.

Time Warner Telecom's own data demonstrates that Ameritech's special access service delivery continues to be a problem.[7] In aggregate, however, Time Warner Telecom provides the following data on Ameritech's special access performance:

Mean Time To Restore Service: when a special access circuit fails, Time Warner Telecom expects that the average time to restore the circuit would be less than 2 hours. In December, one special access circuit was out of service for over 5 days (136.55 hours).

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[6] As Time Warner Telecom notes in its motion for confidential treatment filed contemporaneously with this request, it is not requesting confidential treatment of this data for Ameritech, however it is not providing this data to the Commission with this pleading in order to allow Ameritech to file a motion for confidential treatment, if it so desires. If Ameritech has not filed a motion by the time the Commission rules on Time Warner Telecom's request for confidential treatment of Time Warner Telecom's data, we intend to provide Ameritech's data to the Commission as Exhibit 4.

[7] Time Warner Telecom has filed a motion for confidential treatment of this specific data and will provide it under seal once the Commission has ruled on the motion as Exhibit 5.

In January, it took Ameritech nearly 3 days (70.05 hours) to restore another circuit. A third circuit was out for nearly one day (23.55 hours). In recent months, Ameritech has improved, but only 1 out of 10 circuits was restored within 2 hours in May. In June, only 3 out of 17 circuits were restored within 2 hours. Of those 14 that exceed the 2 hour expected mean time to restore, one was finally restored in 11 hours and another was restored in 32 hours.

Past Due Circuits: While Time Warner Telecom does not expect that 100% of the circuits will be installed by the due date, it does expect that 97% of them will be installed within 5 days of the due date. However, In the first 6 months of this year, Ameritech has missed the due date on special access circuits 12 times, in some instances, by as much as 50 days. Ameritech missed due dates for special access DS1s with 4 instances at or under 5 days late, 3 instances between 5 and 15 days late, and 4 instances at or under 25 days late, and one instance at 50 days late. Ameritech's explanation for the missed due dates include bad cable pairs, air pressure problems with cable, wiring issues, new router needed, no facilities at CEV box, and/or circuit was designed improperly.

Repeat Trouble and Chronic Troubles on Circuits. Time Warner Telecom expects that all new circuits are installed correctly and work trouble-free once provisioning is complete. If a trouble does occur, it is also Time Warner Telecom's expectation that repairs be made correctly the "first time". Repeat troubles should be the exception – not the rule – and should occur less than 1% of the time. In May and June, Ameritech had 5 circuits that had repeat troubles for Time Warner Telecom and one of those circuits had 3 instances of repeat trouble.

Over the last month, Time Warner Telecom has had a series of chronic troubles and repeat troubles on special access circuits ordered, provisioned and maintained by Ameritech, which have a detrimental impact on Time Warner Telecom's customers. For example, one customer (a medical group) was out of service for 17 hours this month. Time Warner Telecom advised Ameritech that the circuit was down at 3:12 p.m. Time Warner Telecom worked throughout the night to get Ameritech to repair the circuit. Ameritech had committed to be at the customer's premise by 7 a.m. to repair the circuit, but Ameritech's workers had a shift change at 7 a.m., put the trouble ticket back in the queue and the circuit wasn't repaired until almost 9 a.m. During the time the circuit was done, and the customer was without service, the medical group had a medical emergency and obviously could not use the telephone to reach one of their physicians. Needless to say, the customer was furious.

In the last 9 months, one Time Warner Telecom customer has had 7 instances of trouble with the Ameritech special access circuit. Another customer had a circuit fail 5 times in one month because of trouble with the Ameritech special access circuit. Yet another customer had five troubles within 3 months, all due to Ameritech's special access circuit.

The Joint Competitive Industry Proposal is an Appropriate Tool for Assessing Special Access Service Delivery

As was stated earlier, Time Warner Telecom and Worldcom are two of many competitive entrants that assisted in the development of the JCIG proposal as a tool to govern ILEC provision of special access service. The proposal is comprehensive, and includes the necessary business rules, calculation methodology, product disaggregations, performance standards, and reporting structure to provide meaningful information to the

individual CLEC and CLECs in the aggregate. Much effort and energy has gone into the development of the JCIG proposal, and CLECs believe this document will satisfy the Commission's Principle No. 7. Time Warner Telecom and Worldcom respectfully encourage the IURC to adopt the JCIG proposal and require Ameritech to fully implement it immediately.

Self Effectuating Remedies are Appropriate

Time Warner Telecom believes that a system of self-effectuating remedies is a critical enforcement tool to help safeguard against poor special access service delivery by Ameritech. Remedies for missed installations and service outage credits that are currently enumerated in Ameritech's Federal and State Access tariffs are simply not sufficient incentive for Ameritech to correct patterns of poor performance. As was illustrated in an earlier section, Ameritech consistently provides substandard on-time provisioning performance, and little recourse is available outside of the lengthy FCC complaint process, to correct the deficient behavior. Time Warner Telecom has identified and recommends the following JCIG metrics, as set forth in Exhibit 2, have self-effectuating remedies apply:

JIP-SA-1 – FOC receipt

JIP-SA-4 - On Time Performance to FOC Due Date

JIP-SA-7 - Past Due Circuits

JIP-SA-8 – New Installation Trouble Report Rate

JIP-SA-9 – Failure Rate

JIP-SA-10 – Mean Time to Restore

JIP-SA-11 – Repeat Trouble Rate

Time Warner Telecom recommends that the remaining JCIG performance metrics be diagnostic, and open to discussion and review in a periodic review process like the six month review process for other performance measures.

Actions Taken by Other States Regarding Special Access Reporting

Since this Commission issued the guidance on Principle 7 on September 11, 2001, Utah, Colorado and Washington have each ordered Qwest, in Qwest's 271 proceedings, to include, at a minimum, reporting of performance for special access services. Other states have also ordered special access reporting. Below is the list of those states and the proceedings.

- Minnesota: The Minnesota PUC became the first state to issue an order finding explicit jurisdiction over an ILEC's (Qwest/U S WEST's) interstate special access for performance reporting. *In the Matter of the Complaint of AT&T Communications of the Midwest, Inc. Against U S WEST Communications, Inc. Regarding Access Service.* Docket No. P-421/C-99-1183, Order Finding Jurisdiction, Rejecting Claims For Relief, And Opening Investigation (issued August 15, 2000).

  In March 2002, the Minnesota PUC adopted metrics proposed by WorldCom (*i.e.*, the metrics developed and advocated by WorldCom before they were subsequently modified and endorsed by the Joint Competitive Industry Group) and required Qwest to report on its performance in provisioning special access to its wholesale competitor customers. *In the Matter of Qwest Wholesale Service Quality Standards* Docket No. P-421/M-00-849, Order Setting Reporting Requirements And Future Procedures (issued March 4, 2002)

  In May 2002, the Minnesota PUC issued an order denying Qwest's motion for reconsideration. *In the Matter of Qwest Wholesale Service Quality Standards,* Docket No. P-421/M-00-849, Order Denying Reconsideration And Modifying Order On Own Motion (issued May 29, 2002).

- New York: Verizon reports on its special access performance on an interstate and intrastate basis, for both wholesale and retail customers, to the New York Public Service Commission, as part of the NYPSC's "Special Services Guidelines." Verizon has been reporting under the New York Guidelines since the mid-1980s.

In June 2001, the New York PSC updated the Guidelines, adding additional metrics. CASE 00-C-2051 - *Proceeding on Motion of the Commission to Investigate Methods to Improve and Maintain High Quality Special Services Performance by Verizon New York Inc;* CASE 92-C-0665 - *Proceeding on Motion of the Commission to Investigate Performance-Based Incentive Regulatory Plans for New York Telephone Company.* Opinion And Order Modifying Special Services Guidelines For Verizon New York Inc., Conforming Tariff, And Requiring Additional Performance Reporting (Issued and Effective June 15, 2001).

In December 2001, the NY PSC slightly revised and updated the Special Services Guidelines on reconsideration. CASE 00-C-2051 - *Proceeding to Investigate Methods to Improve and Maintain High Quality Special Services Performance by Verizon New York Inc.;* CASE 92-C-0665 - *Proceeding on Motion of the Commission to Investigate Performance-Based Incentive Regulatory Plans for New York Telephone Company.* Order Denying Petitions For Rehearing And Clarifying Applicability Of Special Services Guidelines (Issued December 20, 2001)

- Colorado: In November 2001, the Colorado PUC affirmed the requirement for Qwest to monitor and report special access information. Docket No. 01I-041T, *In The Matter Of The Investigation Into Alternative Approaches For A Qwest Corporation Performance Assurance Plan In Colorado*; Decision On Motions For Modification And Clarification Of The Colorado Performance Assurance Plan, November 5, 2001

  In March 2002, Qwest's petition for reconsideration of that Order was denied by the Colorado PUC, and implementation of special access reporting is underway. *In the Matter of the Investigation into Alternative Approaches for a Qwest Corporation Performance Assurance Plan in Colorado,* Docket No. 01I-041T, Decision on Remand and Other Issues Pertaining to the Colorado Performance Assurance Plan (adopted March 27, 2002)

- New Hampshire: In December 2001, Verizon began reporting special access service results to the New Hampshire PUC pursuant to stipulation. DT 01-006 *VERIZON NEW HAMPSHIRE Petition to Approve Carrier to Carrier Performance Guidelines and Performance Assessment Plan,* Order Regarding Metrics and Plan (issued March 29, 2002, referring to Stipulation).

- Maine: In April 2002, as part of its Order adopting a Performance Assurance Plan for Verizon's §271 related obligations, the Maine PUC also accepted a voluntary agreement from Verizon to report its intrastate and interstate special access performance against certain New York Special Services Guidelines. *Inquiry Regarding the Entry of Verizon-Maine into the InterLATA (Long*

Distance) Telephone Market Pursuant to Section 271 of the Telecommunications Act of 1996, Docket No. 2000-849, Findings Report (April 10, 2002)

- Washington: In ruling on jurisdictional arguments raised by Qwest in an AT&T complaint on Qwest's Special Access performance, the Washington Utilities and Transportation Commission held that there was an absence of clear authority that the 10% rule pre-empts all state authority, and further reasoned that the public and the economy of the state required the UTC to assert jurisdiction where it is lawful. WUTC Docket No. UT-991292, *In Re the Complaint of AT&T Communications of the Northwest, Inc., v. U S WEST Communications, Inc, Regarding the Provision of Access Services*, Tenth Supplemental Order, May 18, 2000.

  In April 2002, the Washington Utilities and Transportation Commission ("WUTC") adopted the Colorado special access performance metrics to measure Qwest's interstate and intrastate wholesale special access performance. *In the Matter of the Investigation into US West Communications, Inc.'s Compliance with Section 271 of the Telecommunications Act of 1996*, Docket No. UT-003022, 30th Supplemental Order, Commission Order Addressing Qwest's Performance Assurance Plan.

  In May 2002, the WUTC denied Qwest's petition for reconsideration regarding its special access reporting. *In the Matter of the Investigation into US West Communications, Inc.'s Compliance with Section 271 of the Telecommunications Act of 1996*, Docket No. UT-003022, 33rd Supplemental Order; Denying in Part and Granting in Part, Qwest's Petition for Reconsideration of the 30th Supplemental Order.

- Tennessee: In May 2002, the Tennessee Regulatory Authority adopted a modified version of WorldCom's original (i.e., pre-Joint Competitive Industry Group) metrics. *In re: Docket to Establish Generic Performance Measurements, Benchmarks and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*, Docket No. 01-00193, Order Setting Performance Measurements, Benchmarks and Enforcement Mechanisms (issued May 14, 2002). BellSouth did not request reconsideration of the special access portion of that order.

- Utah: In June 2002, the Utah Public Service Commission ordered Qwest to include special access in its Sec. 271-related Performance Assurance Plan. *In the Matter of the Applications of QWEST CORPORATION, fka US WEST Communications, Inc., for Approval of Compliance with 47 U.S.C. § 271(d)(3)(C)*, Docket No. 00-049-08, Order On Performance Assurance Plan (issued June 18, 2002).

- Massachusetts: In August 2001, the Massachusetts Department of Telecommunications and Energy ordered Verizon to report its special access performance on both an interstate and intrastate basis, as an interim matter, pending completion of its review of Verizon's performance on both a wholesale

basis for both affiliated and non-affiliated customers, and on a retail basis to Verizon's own retail customers. *Investigation by the Department of Telecommunications and Energy on its own motion pursuant to G.L. c. 159, §§ 12 and 16, into Verizon New England Inc., d/b/a Verizon Massachusetts' provision of Special Access Services.* D.T.E. Docket No. 01-34, Order, August 19, 2001.

- Texas: The Texas PUC found in its review of Southwestern Bell's post-271 performance: "... to the extent a CLEC orders special access in lieu of UNEs, SWBT's performance shall be measured as another level of disaggregation in all

  UNE measures. Texas PUC Project No, 20400 - *Section 271 Compliance Monitoring of Southwestern Bell Telephone Company of Texas*, Order No. 33, Approving Modification to Performance Remedy Plan and Performance Measurements, May 24, 2001. The implementation aspects of this decision are currently pending in an arbitration proceeding.

- Other states where special access performance reporting is under consideration:
  - Massachusetts (ordered interim reporting September 2001; final decision pending)
  - New Jersey
  - Illinois (ICC staff has recommended the inclusion of wholesale special access performance in the ICC's state law rulemaking regarding wholesale carrier-to-carrier performance measurements and standards)
  - Georgia
  - Louisiana

Time Warner Telecom and Worldcom urge the Commission to consider this important issue that impacts the development of competition, just as other state Commissions have and include special access performance measures as part of the remedy plan.

Conclusion

The Commission's guidance to the parties in its September 11, 2001 order was right on track. It should develop performance measures and business rules, as well as remedies, for special access services to be included as part of the remedy plan. As Time Warner Telecom and Worldcom explained in the above pleading, and Time Warner Telecom has documented in the confidential documents to be provided in support,

Ameritech's performance on special access is less than adequate and it requires the appropriate incentives to improve that performance, just as it requires the appropriate incentives to improve its performance in the provisioning of UNEs. In order to ensure that one mode of entry (UNE) is not favored over facilities based providers who order special access, the Commission should require that Ameritech consent to the inclusion of special access performance measures and remedies to secure the Commission's recommendation for 271 approval.

Respectfully submitted,

TIME WARNER TELECOM

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document was served upon the following counsel of record, via first class United States mail, postage prepaid, on this 2nd day of August, 2002:

Anne E. Becker
Office of the Utility Consumer Counselor
Indiana Government Center North, Room N501
100 N. Senate Av.
Indianapolis, IN 46204-2208

And to all other counsel of record via e-mail service.

Nikki Shoultz/cjk
Nikki G. Shoultz

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IURC Cause No. 41657

Exhibit 1

January 22, 2002

The Honorable Michael K. Powell
Chairman
Federal Communications Commission
445 Twelfth Street, S.W., Suite TW-A325
Washington, D.C. 20554

Re: Joint Competitive Industry Group Proposal Regarding Performance Metrics and Installation Intervals for Interstate Special Access Services

Dear Chairman Powell:

The undersigned competitive telecommunications carriers, trade associations and the eCommerce & Telecommunications Users Group (eTUG) (the "Joint Competitive Industry Group") urge the Commission to adopt performance measures, performance standards, and reporting requirements to govern the provision of special access services by incumbent local exchange carriers (LECs). Since release of the Commission's Notice of Proposed Rulemaking in this proceeding, the Joint Competitive Industry Group has devoted considerable time and effort to the development of a coherent, practical, and enforceable set of such measures, standards and reporting requirements. The results of that effort are reflected in the attached Performance Measurements & Standards applicable to the provision of all interstate special access services by Tier 1/Class A incumbent LECs (Attachment A), as well as the attached proposal regarding Offered Installation Intervals (Attachment B).

The Joint Competitive Industry Group believes that its proposal accomplishes the following objectives:

(1) A united competitive industry and user group view regarding the best way to achieve the quality of special access provisioning required to serve business customers;

(2) A concise set of metrics that will induce proper provisioning and deter discrimination by incumbent LECs;

(3) A set of metrics that can easily be incorporated into a remedy plan.

The Joint Competitive Industry Group therefore urges the Commission to adopt the Group's proposal regarding performance metrics and installation intervals.

Sincerely,

The Joint Competitive Industry Group

Robert W. Quinn, Jr.
Federal Government Affairs Vice President
AT&T Corp.

Jake E. Jennings
Vice President – Regulatory Affairs
NewSouth Communications

Rebecca H. Sommi
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Lisa Korner Butler
Vice President – Regulatory & Industry Relations
Network Plus

Brian Moir
General Counsel
eCommerce & Telecommunications Users Group

Attachments

cc: Commissioner Abernathy
Commissioner Copps
Commissioner Martin
Dorothy Attwood
Jeffrey Carlisle
Michelle Carey
Uzoma Onyeije
Magalie Roman Salas

IURC Cause No. 41657

Exhibit 2

ATTACHMENT A

Joint Competitive Industry Group Proposal

ILEC PERFORMANCE MEASUREMENTS & STANDARDS

in the

Ordering, Provisioning,

and

Maintenance & Repair

of

SPECIAL ACCESS SERVICE

Version 1.1

Issued: January 18, 2002

TABLE OF CONTENTS

Reporting Dimensions

CLEC or IXC Carrier specific total, with the following reporting dimensions for all measurements.

- Special Access disaggregated by bandwidth
  Sub Totaled by State
  Totaled by ILEC

Comparison reports are required for:

- CLEC/ IXC Carrier Aggregate
- ILEC Affiliates Aggregate

Special Access is any exchange access service that provides a transmission path between two or more points, either directly, or through a central office, where bridging or multiplexing functions are performed, not utilizing ILEC end office switches.

Special access services include dedicated and shared facilities configured to support analog/voice grade service, metallic and/or telegraph service, audio, video, digital data service (DDS), digital transport and high capacity service (DS1, DS3 and OCn), collocation transport, links for SS7 signaling and database queries, SONET access including OC-192 based dedicated SONET ring access, and broadband services.

Exclusions: Transmission path requests pursuant to an Interconnection Agreement for Unbundled Network Elements are excluded from these Performance Measures.

Reporting Period: The reporting period is the calendar month, unless otherwise noted, with all averages or percentages displayed to one decimal point.

ILEC Performance Measurements and Standards

ORDERING

Measurement: IP-SA-1 FOC Receipt

Description

The Firm Order Confirmation (FOC) is the ILEC response to an Access Service Request (ASR), whether an initial or supplement ASR, that provides the CLEC or IXC Carrier with the specific Due Date on which the requested circuit or circuits will be installed. The expectation is that the ILEC will conduct a minimum of an electronic facilities check to ensure due dates delivered in FOCs can be relied upon. The performance standard for FOCs received within the standard interval is expressed as a percentage of the total FOCs received during the reporting period. A diagnostic distribution is required along with a count of ASRs withdrawn at the ILEC's request due to a lack of ILEC facilities or otherwise.

Calculation Methodology

Percent Meeting Performance Standard:
[Count FOCs received where (FOC Receipt Date – ASR Sent Date) < = Performance Standard] / Total FOCs received during reporting period x 100

FOC Receipt - Distribution:
(FOC Receipt Date – ASR Sent Date), for each FOC received during reporting period, distributed by:
0 day, 1 day, 2 days, through 10 days and > 10 days

ASRs Withdrawn at ILEC Request due to a lack of ILEC Facilities or Otherwise
Count of ASRs, which have not yet received a FOC, Withdrawn at ILEC Request, during the current reporting period, due to a lack of ILEC facilities or otherwise

Business Rules

1. Counts are based on each instance of a FOC received from the ILEC. If one or more Supplement ASRs are issued to correct or change a request, each corresponding FOC, which is received during the reporting period, is counted and measured.
2. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.
3. Projects are included. Determination of what is identified as a project varies by ILEC and should not alter the need to ensure that service is provided within expected intervals.

Exclusions

- Unsolicited FOCs
- Disconnect ASRs
- Cancelled ASRs
- Record ASRs

Levels of Disaggregation

- DS0
- DS1
- DS3
- OCn

Performance Standard

Percent FOCs Received within Standard
- DS0 = > 98.0% within 2 business days
- DS1 = > 98.0% within 2 business days
- DS3 = > 98.0% within 5 business days
- OCn - ICB (Individual Case Basis)

FOC Receipt Distribution - Diagnostic

ASRs Withdrawn at ILEC Request Due to a Lack of ILEC Facilities or Otherwise - Diagnostic

ILEC Performance Measurements and Standards

ORDERING

Measurement: JIP-SA-2 FOC Receipt Past Due

Description

The FOC Receipt Past Due measure tracks all ASR requests that have not received an FOC from the ILEC within the expected FOC receipt interval, as of the last day of the reporting period and do not have an open, or outstanding, Query/Reject. This measure gauges the magnitude of late FOCs and is essential to ensure that FOCs are being received in a timely manner from the ILECs. A distribution of these late FOCs, along with a report of those late FOCs that do have an open Query/Reject, is required for diagnostic purposes.

Calculation Methodology

Percent FOC Receipt Past Due - Without Open Query/Reject:

Sum of ASRs without a FOC Received, and a Query/Reject is not open, where (End of Reporting Period – ASR Sent Date >Expected FOC Receipt Interval) / Total number of ASRs sent during reporting period x 100

FOC Receipt Past Due - Without Open Query/Reject - Distribution:

[(End of Reporting Period – ASR Sent date) – (Expected FOC Receipt Interval)] for ASRs without a FOC received and a Query/Reject is not open with the CLEC or IXC Carrier, distributed by;
1-5 Days, 6-10 Days, 11-20 Days, 21- 30 Days, 31-40 Days, and > 40 Days

Percent FOC Receipt Past Due - With Open Query/Reject:

Sum of ASRs without a FOC Received, and a Query/Reject is open, where (End of Reporting Period – ASR Sent Date > Expected FOC Receipt Interval) / Total number of ASRs sent during reporting period x 100

Business Rules

1. All counts are based on the latest ASR request sent to the ILEC. Where one or more subsequent ASRs have been sent, only the latest ASR would be recorded as Past Due if no FOC had yet been returned.
2. The Expected FOC Receipt Interval, used in the calculations, will be the interval identified in the Performance Standards for the FOC Receipt measure.
3. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.
4. Projects are included. Determination of what is identified as a project varies by ILEC and should not alter the need to ensure that service is provided within expected intervals.

Exclusions

- Unsolicited FOCs
- Disconnect ASRs
- Cancelled ASRs
- Record ASRs

Levels of Disaggregation

- DS0
- DS1
- DS3
- OCn

Performance Standard

Percent FOC Receipt Past Due - Without Open Query/Reject	< 2.0 % FOC Receipt Past Due
FOC Receipt Past Due – Without Open Query/Reject - Distribution	- Diagnostic
Percent FOC Receipt Past Due - With Open Query/Reject	- Diagnostic

ORDERING

Measurement: JIP-SA-3 Offered Versus Requested Due Date

Description

The Offered Versus Requested Due Date measure reflects the degree to which the ILEC is committing to install service on the CLEC or IXC Carrier Requested Due Date (CRDD), when a Due Date Request is equal to or greater than the ILEC stated interval. A distribution of the delta, the difference between the CRDD and the Offered Date, for these FOCs is required for diagnostic purposes.

Calculation Methodology

Percent Offered with CLEC or IXC Carrier Requested Due Date:
[Count of ASRs where (FOC Due Date = CRDD] / [Total number of ASRs where (CRDD – ASR Sent Date) = > ILEC Stated Interval] x 100

Offered versus Requested Interval Delta – Distribution:
[(Offered Due Date – CRDD) where (CRDD – ASR Sent Date) = > ILEC Stated Interval] for each FOC received during the reporting period, distributed by; 0 Days, 1-5 Days, 6-10 Days, 11-20 Days, 21- 30 Days, 31-40 Days, and > 40 Days

Business Rules

1. Counts are based on each instance of a FOC received from the ILEC. If one or more Supplement ASRs are issued to correct or change a request, each corresponding FOC, which is received during the reporting period, is counted and measured.
2. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.
3. Projects are included. Determination of what is identified as a project varies by ILEC and should not alter the need to ensure that service is provided within expected intervals.

Exclusions

- Unsolicited FOCs
- Disconnect ASRs
- Cancelled ASRs
- Record ASRs

Levels of Disaggregation

- DS0
- DS1
- DS3
- OCn

Performance Standard

Percent Offered with CRDD (where CRDD = > ILEC Stated Interval) = 100%
Offered versus Requested Interval Delta – Distribution - Diagnostic

ILEC Stated Intervals: To be determined by ILEC

PROVISIONING

Measurement: JIP-SA-4 On Time Performance To FOC Due Date

Description

On Time Performance To FOC Due Date measures the percentage of circuits that are completed on the FOC Due Date, as recorded from the FOC received in response to the last ASR sent. Customer Not Ready (CNR) situations may result in an installation delay. The On Time Performance To FOC Due Date is calculated both with CNR consideration, i.e. measuring the percentage of time the service is installed on the FOC due date while counting CNR coded orders as an appointment met, and without CNR consideration.

Calculation Methodology

Percent On Time Performance to FOC Due Date – With CNR Consideration:
[(Count of Circuits Completed on or before ILEC Committed Due Date + Count of Circuits Completed after FOC Due Date with a verifiable CNR code) / (Count of Circuits Completed in Reporting Period)] x 100

Percent On Time Performance to FOC Due Date – Without CNR Consideration:
[(Count of Circuits Completed on or before ILEC Committed Due Date) / (Count of Circuits Completed in Reporting Period)] x 100

Note: The denominator for both calculations is the total count of circuits completed during the reporting period, including all circuits, with and without a CNR code.

Business Rules

1. Measures are based on the last ASR sent and the associated FOC Due Date received from the ILEC.
2. Selection is based on circuits completed by the ILEC during the reporting period. An ASR may provision more than one circuit and ILECs may break the ASR into separate internal orders, however, the ASR is not considered completed for measurement purposes until all circuits are completed.
3. The ILEC Completion Date is the date upon which the ILEC completes installation of the circuit, as noted on a completion advice to the CLEC or IXC Carrier.
4. Projects are included. Determination of what is identified as a project varies by ILEC and should not alter the need to ensure that service is provided on the FOC Due Date.
5. A Customer Not Ready (CNR) is defined as a verifiable situation beyond the normal control of the ILEC that prevents the ILEC from completing an order, including the following: CLEC or IXC Carrier is not ready; end user is not ready; connecting company, or CPE (Customer Premises Equipment) supplier, is not ready. The ILEC must ensure that established procedures are followed to notify the CLEC or IXC Carrier of a CNR situation and allow a reasonable period of time for the CLEC or IXC Carrier to correct the situation.

Exclusions

- Unsolicited FOCs
- Disconnect ASRs
- Cancelled ASRs
- Record ASRs

Levels of Disaggregation

- DS0
- DS1
- DS3
- OCn

Performance Standard

Percent On Time to FOC Due Date - With CNR Consideration = > 98.0 % On Time
Percent On Time to FOC Due Date - Without CNR Consideration - Diagnostic

PROVISIONING

Measurement: JIP-SA-5 Days Late

Description

Days Late captures the magnitude of the delay, both in average and distribution, for those circuits not completed on the FOC Due Date, and the delay was not a result of a verifiable CNR situation. A breakdown of delay days caused by a lack of ILEC facilities is required for diagnostic purposes.

Calculation Methodology

Average Days Late:

Σ[Circuit Completion Date – ILEC Committed Due Date (for all Circuits Completed Beyond ILEC Committed Due Date without a CNR code)] / (Count of Circuits Completed Beyond ILEC Committed Due Date without a CNR code)

Days Late Distribution:

Circuit Completion Date – ILEC Committed Due Date (for all Circuits Completed Beyond ILEC Committed Due Date without a CNR code) distributed by: 1 day, 2-5 Days, 6-10 Days, 11-20 Days, 21- 30 Days, 31-40 Days, and > 40 Days

Average Days Late Due to a Lack of ILEC Facilities:

Σ[Circuit Completion Date – ILEC Committed Due Date (for all Circuits Completed Beyond ILEC Committed Due Date without a CNR code and due to a Lack of ILEC Facilities] / (Count of Circuits Completed Beyond ILEC Committed Due Date without a CNR code and due to a Lack of ILEC Facilities)

Business Rules

1. Measures are based on the last ASR sent and the associated FOC Due Date received from the ILEC.
2. Selection is based on circuits completed by the ILEC during the reporting period. An ASR may provision more than one circuit and ILECs may break the ASR into separate internal orders, however, the ASR is not considered completed for measurement purposes until all circuits are completed.
3. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.
4. Projects are included. Determination of what is identified as a project varies by ILEC and should not alter the need to ensure that service is provided on the FOC Due Date.
5. A Customer Not Ready (CNR) is defined as a verifiable situation beyond the normal control of the ILEC that prevents the ILEC from completing an order, including the following: CLEC or IXC Carrier is not ready; end user is not ready; connecting company, or CPE (Customer Premises Equipment) supplier, is not ready. The ILEC must ensure that established procedures are followed to notify the CLEC or IXC Carrier of a CNR situation and allow a reasonable period of time for the CLEC or IXC Carrier to correct the situation

Exclusions

- Unsolicited FOCs
- Disconnect ASRs
- Cancelled ASRs
- Record ASRs

Levels of Disaggregation

- DS0
- DS1
- DS3
- OCn

Performance Standard

Average Days Late	< 3.0 Days
Days Late Distribution	- Diagnostic
Average Days Late Due to a Lack of ILEC Facilities	- Diagnostic

ILEC Performance Measurements and Standards

PROVISIONING

Measurement: PP-SA-6 Average Intervals - Requested/Offered/Installation

Description

The intent of this measure is to capture three important aspects of the provisioning process and display them in relation to each other. The Average CLEC or IXC Carrier Requested Interval, the Average ILEC Offered Interval, and the Average Installation Interval, provide a comprehensive view of provisioning, with the ultimate goal of having these three intervals equivalent.

Calculation Methodology

Average CLEC or IXC Carrier Requested Interval:
Sum (CRDD – ASR Sent Date) / Total Circuits Completed during reporting period

Average ILEC Offered Interval:
Sum (FOC Due Date – ASR Sent Date) / Total Circuits Completed during reporting period

Average Installation Interval:
Sum (ILEC Completion Date – ASR Sent Date) / Total Circuits Completed during reporting period

Business Rules

1. Measures are based on the last ASR sent and the associated FOC Due Date received from the ILEC.
2. Selection is based on circuits completed by the ILEC during the reporting period. An ASR may provision more than one circuit and ILECs may break the ASR into separate internal orders, however, the ASR is not considered completed for measurement purposes until all circuits are completed.
3. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.
4. Projects are included. Determination of what is identified as a project varies by ILEC and should not alter the need to ensure that service is provided within expected intervals.
5. The Average Installation Interval includes all completions.

Exclusions

- Unsolicited FOCs
- Disconnect ASRs
- Cancelled ASRs
- Record ASRs

Levels of Disaggregation

- DS0
- DS1
- DS3
- OCn

Performance Standard

Average Requested Interval	- Diagnostic
Average Offered Interval	- Diagnostic
Average Installation Interval	- Diagnostic

Measurement: IP-SA-7 Past Due Circuits

Description

The Past Due Circuits measure provides a snapshot view of circuits not completed as of the end of the reporting period. The count is taken from those circuits that have received an FOC Due Date but the date has passed. Results are separated into those held for ILEC reasons and those held for CLEC or IXC Carrier reasons (CNRs), with a breakdown, for diagnostic purposes, of Past Due Circuits due to a lack of ILEC facilities. A diagnostic measure, Percent Cancellations After FOC Due Date, is included to show a percent of all cancellations processed during the reporting period where the cancellation took place after the FOC Due Date had passed

Calculation Methodology

Percent Past Due Circuits:

[(Count of all circuits not completed at the end of the reporting period > 5 days beyond the FOC Due Date, grouped separately for Total ILEC Reasons, Lack of ILEC Facility Reasons, and Total CLEC/Carrier Reasons) / (Total uncompleted circuits past FOC Due Date, for all missed reasons, at the end of the reporting period)] x 100

Past Due Circuits Distribution:

Count of all circuits past the FOC Due Date that have not been reported as completed (Calculated as last day of reporting period - FOC Due Date) Distributed by: 1-5 days, 6-10 days, 11-20 days, 21-30 days, 31-40 Days, > 40 days

Percent Cancellations After FOC Due Date:

[Count (All circuits cancelled during reporting period, that were Past Due at the end of the previous reporting period, where (Date Cancelled > FOC Due Date) / (Total circuits Past Due at the end of the previous reporting period)] x 100

Business Rules

1. Calculation of Past Due Circuits is based on the most recent ASR and associated FOC Due Date.
2. An ASR may provision more than one circuit and ILECs may break the ASR into separate internal orders, however, the ASR is not considered completed for measurement purposes until all segments are completed.
3. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.
4. Projects are included. Determination of what is or is not identified as a project varies by ILEC and should not alter the need to ensure that service is provided on the FOC Due Date.
5. A Customer Not Ready (CNR) is defined as a verifiable situation beyond the normal control of the ILEC that prevents the ILEC from completing an order, including the following: CLEC or IXC Carrier is not ready; end user is not ready; connecting company, or CPE (Customer Premises Equipment) supplier, is not ready. The ILEC must ensure that established procedures are followed to notify the CLEC or IXC Carrier of a CNR situation and allow a reasonable period of time for the CLEC or IXC Carrier to correct the situation

Exclusions

- Unsolicited FOCs
- Disconnect ASRs
- Record ASRs

Levels of Disaggregation

- DS0 / DS1 / DS3 / OCn

Performance Standard

Percent Past Due Circuits - Total ILEC Reasons	< 3.0 % > 5 days beyond FOC Due Date
Percent Past Due Circuits - Due to Lack of ILEC Facilities	- Diagnostic
Percent Past Due Circuits - Total CLEC Reasons	- Diagnostic
Past Due Circuits Distribution	- Diagnostic
Percent Cancellation After FOC Due Date	- Diagnostic

ILEC Performance Measurements and Standards

PROVISIONING

Measurement PR-8: New Installation Trouble Report Rate

Description

New Installation Trouble Report Rate measures the quality of the installation work by capturing the rate of trouble reports on new circuits within 30 calendar days of the installation.

Calculation Methodology

Trouble Report Rate Within 30 Calendar Days of Installation:
[Count (trouble reports within 30 Calendar Days of Installation) / (Total Number of Circuits Installed in the Report Period)] x 100

Business Rules

1. The ILEC Completion Date is the date upon which the ILEC completes installation of the circuit, as noted on a completion advice to the CLEC or IXC Carrier.
2. The calculation for the preceding 30 calendar days is based on the creation date of the trouble ticket.

Exclusions

- Trouble tickets that are canceled at the CLEC's or IXC Carrier's request
- CLEC, IXC Carrier, CPE (Customer Premises Equipment), or other customer caused troubles
- ILEC trouble reports associated with administrative service
- Tickets used to track referrals of misdirected calls
- CLEC or IXC Carrier requests for informational tickets

Levels of Disaggregation

- DS0
- DS1
- DS3
- OCn

Performance Standard

New Installation Trouble Report Rate < = 1.0 trouble reports per 100 circuits installed

ILEC Performance Measurements and Standards

MAINTENANCE & REPAIR

Measurement: JIP-SA-9 Failure Rate

Description

Failure Rate measures the overall quality of the circuits being provided by the ILEC and is calculated by dividing the number of troubles resolved during the reporting period by the total number of "in service" circuits, at the end of the reporting period, and is then annualized by multiplying by 12 months.

Calculation Methodology

Failure Rate – Annualized:

{[(Count of Trouble Reports resolved during the Reporting Period) / (Number of Circuits In Service at the end of the Report Period)] x 100} x 12

Business Rules

1. A trouble report/ticket is any record (whether paper or electronic) used by the ILEC for the purposes of tracking related action and disposition of a service repair or maintenance situation.
2. A trouble is resolved when the ILEC issues notice to the CLEC or IXC Carrier that the circuit has been restored to normal operating parameters.
3. Where more than one trouble is resolved on a specific circuit during the reporting period, each trouble is counted in the Trouble Report Rate.

Exclusions:

- Trouble tickets that are canceled at the CLEC's or IXC Carrier's request
- CLEC, IXC Carrier, CPE (Customer Premises Equipment), or other customer caused troubles
- ILEC trouble reports associated with administrative service
- CLEC or IXC Carrier requests for informational tickets
- Tickets used to track referrals of misdirected calls

Levels of Disaggregation

- Below DS3 (DS0 + DS1)
- DS3 and Above (DS3 + OCn)

Performance Standard

Failure Rate Annualized	- Below DS3	< = 10.0%
	- DS3 and Above	< = 10.0%

MAINTENANCE & REPAIR

Measurement: JIP-8.3-10 Mean Time to Restore

Description

The Mean Time To Restore interval measures the promptness in restoring circuits to normal operating levels when a problem or trouble is referred to the ILEC. Calculation is the elapsed time from the CLEC or IXC Carrier submission of a trouble report to the ILEC to the time the ILEC closes the trouble, less any Customer Hold Time or Delayed Maintenance Time due to valid customer, CLEC, or IXC Carrier caused delays. A breakdown of the percent of troubles outstanding greater than 24 hours, and the Mean Time to Restore of those troubles recorded as Found OK / Test OK, is required for diagnostic purposes.

Calculation Methodology

Mean Time To Restore:

Σ [(Date and Time of Trouble Ticket Resolution Closed to the CLEC or IXC Carrier – Date and Time of Trouble Ticket Referred to the ILEC) – (Customer Hold Times)] / (Count of Trouble Tickets Resolved in Reporting Period)]

% Out of Service Greater than 24 hrs:

[Count of Troubles where (Date and Time of Trouble Ticket Resolution Closed to the CLEC or IXC Carrier – Date and Time of Trouble Ticket Referred to the ILEC) – (Customer Hold Times) is > 24 hrs / (Count of Trouble Tickets Resolved in Reporting Period)] x 100

Mean Time To Restore – Found OK / Test OK:

Σ [(Date and Time of Trouble Ticket Resolution Closed to the CLEC or IXC Carrier as Found OK/Test OK – Date and Time of Trouble Ticket Referred to the ILEC) – (Customer Hold Times)] / (Count of Trouble Tickets Resolved in Reporting Period as Found OK/Test OK)]

Business Rules

1. A trouble report or trouble ticket is any record (whether paper or electronic) used by the ILEC for the purposes of tracking related action and disposition of a service repair or maintenance situation.
2. Elapsed time is measured on a 24-hour, seven-day per-week basis, without consideration of weekends or holidays.
3. Multiple reports in a given period are included, unless the multiple reports for the same customer is categorized as "subsequent" (an additional report on an already open ticket).
4. "Restore" means to return to the normally expected operating parameters for the service regardless of whether or not the service, at the time of trouble ticket creation, was operating in a degraded mode or was completely unusable. A trouble is "resolved" when the ILEC issues notice to the CLEC or IXC Carrier that the customer's service is restored to normal operating parameters.
6. Customer Hold Time or Delayed Maintenance Time resulting from verifiable situations of no access to the end user's premises, or other CLEC or IXC Carrier caused delays, such as holding the ticket open for monitoring, is deducted from the total resolution interval.

Exclusions:

- Trouble tickets that are canceled at the CLEC's or IXC Carrier's request
- CLEC, IXC Carrier, CPE (Customer Premises Equipment), or other customer caused troubles
- ILEC trouble reports associated with administrative service
- CLEC or IXC Carrier requests for informational tickets
- Trouble tickets created for tracking and/or monitoring circuits
- Tickets used to track referrals of misdirected calls

Levels of Disaggregation

- Below DS3 (DS0 + DS1)
- DS3 and Above (DS3 + OCn)

Performance Standard

Mean Time to Restore	- Below DS3	< = 2.0 Hours
	- DS3 and Above	< = 1.0 Hour
% Out of Service > 24 Hrs		- Diagnostic
Mean Time to Restore – Found OK / Test OK		- Diagnostic

Measurement: IIP-SA-11 Repeat Trouble Report Rate

Description

The Repeat Trouble Report Rate measures the percent of maintenance troubles resolved during the current reporting period that had at least one prior trouble ticket any time in the preceding 30 calendar days from the creation date of the current trouble report.

Calculation Methodology

Repeat Trouble Report Rate:
[(Count of Current Trouble Reports with a previous trouble, reported on the same circuit, in the preceding 30 calendar days)] / (Number of Reports in the Report Period) x 100

Business Rules

1. A trouble report or trouble ticket is any record (whether paper or electronic) used by the ILEC for the purposes of tracking related action and disposition of a service repair or maintenance situation.
2. A trouble is resolved when the ILEC issues notice to the CLEC or IXC Carrier that the circuit has been restored to normal operating parameters.
3. If a trouble ticket was closed out previously with the disposition code classifying it as FOK/TOK/CPE/IXC, then the second trouble must be counted as a repeat trouble report if it is resolved to ILEC reasons.
4. The trouble resolution need not be identical between the repeated reports for the incident to be counted as a repeated trouble.

Exclusions:

- Trouble tickets that are canceled at the CLEC's or IXC Carrier's request
- CLEC, IXC Carrier, CPE (Customer Premises Equipment), or other customer caused troubles
- ILEC trouble reports associated with administrative service
- Subsequent trouble reports – defined as those cases where a customer called to check on the status of an existing open trouble ticket

Levels of Disaggregation

- Below DS3 (DS0 + DS1)
- DS3 and Above (DS3 + OCn)

Performance Standards

Repeat Trouble Report Rate	- Below DS3	<= 6.0%
	- DS3 and Above	<= 3.0%

GLOSSARY

Term	Definition
Access Service Request (ASR)	A request to an ILEC to order new service, or request a change to existing service, which provides access to the local exchange company's network, under terms specified in the local exchange company's special or switched access tariffs
Business Days	Monday thru Friday excluding holidays
Customer Not Ready (CNR)	A verifiable situation beyond the normal control of the ILEC that prevents the ILEC from completing an order, including the following: CLEC or IXC Carrier is not ready; end user is not ready; connecting company, or CPE (Customer Premises Equipment) supplier, is not ready
Facility Check	A pre-provisioning check performed by the ILEC, in response to an access service request, to determine the availability of facilities and assign the installation date
Firm Order Confirmation (FOC)	The notice returned from the ILEC, in response to an Access Service Request from a CLEC or IXC Carrier that confirms receipt of the request, that a facility has been made, and that a service request has been created with an assigned due date
Unsolicited FOC	An Unsolicited FOC is a supplemental FOC issued by the ILEC to change the due date or for other reasons, although no change to the ASR was requested by the CLEC or IXC Carrier
Project	Service requests that exceed the line size and/or level of complexity that would allow the use of standard ordering and provisioning processes
Query/Reject	An ILEC response to an ASR requesting clarification or correction to one or more fields on the ASR before an FOC can be issued
Repeat Trouble	Trouble that reoccurs on the same telephone number/circuit ID within 30 calendar days
Supplement ASR	A revised ASR that is sent to change due dates or alter the original ASR request. A "Version" indicator related to the original ASR number tracks each Supplement ASR.

IURC Cause No. 41657

Exhibit 3

SBC Ameritech Proposed
Special Access Service Objectives

Version ~~1.2~~–1.3

~~4/10/2002~~

5/10/02

SBC Ameritech Proposed Special Access Service Objectives

TABLE OF CONTENTS

SBC Ameritech Proposed Special Access Service Objectives

Overview

The purpose of this document is to define SBC Ameritech service performance objectives used to measure the quality and timeliness of special access services (does not include switched services) provided to customers of SBC Ameritech. This document has been developed to assist in conducting business-to-business conversations with SBC's Access Customers. It does not represent a willingness to endorse or support regulatory efforts to invoke Performance Measures and/or remedies for Special Access Services. These objectives cover the essential aspects or Ordering, Provisioning and Maintenance & Repair activities in the 5 SBC Ameritech states (Illinois, Michigan, Indiana, Ohio & Wisconsin). It is SBC Ameritech's intent to track each proposed Provisioning and Maintenance performance metric at the regional and state level. Ordering metrics will be reported exclusively at the Regional level. Additionally, SBC Ameritech is only willing to measure the performance of specific special access services/products when predetermined in-service quantities exist - allowing for a statistically valid result to be calculated. Specifically, the in-service inventory of any service/product must be 50 or greater circuits, monthly provisioning order volume of 20 or greater; and measured trouble ticket volume of 20 or greater.

Our intent is to respond to the proposed document entitled "Joint Competitive Industry Group Proposal (JIP) ILEC Performance Measurements and Standards in the Ordering, Provisioning and Maintenance & Repair of Access Services – version 1.1" dated January 18, 2002. As detailed in this document, SBC Ameritech agrees to measure 11 of the 11 proposed JIP measures.

SBC Ameritech further believes it important to review the various existing FCC #2 tariff remedies which are noted on each objective as applicable. Attachment #1 of this document provides a description of these remedies.

Attachment #2 details SBC Ameritech's standard interval offerings by service/product type.

ORDERING

Measurement: SBC-AIT FOC Timeliness #1

Description

The Firm Order Confirmation (FOC) is SBC-AIT's response to an access customer's Access Service Request (ASR), whether an initial or supplement ASR, that provides the customer with the specific Due Date on which the requested circuit or circuits will be installed. The performance objective for FOCs issued within the standard interval is expressed as a percentage of the total FOCs issued during the reporting period. SBC currently measures FOC timeliness.

Calculation Methodology

Percent Meeting Objective: Total number of error-free ASRs that are FOC'd within the specified time period divided by the total number of error-free ASRs FOC'd to the customer.

FOC Receipt – Distribution: (FOC issued date – ASR submitted date) for each FOC issued during reporting period, distributed by: 0 day, 1 day, 2 days...10 days, and >10 days.

ASR's withdrawn at ILEC Request due to a lack of ILEC facilities or otherwise: It is NOT SBC-AIT's business practice to request a customer cancel or withdraw a valid ASR for any reason. As such, SBC does not support this metric.

Business Rules

1. The FOC confirmation includes key critical dates and due date is provided to the customer.
2. Upon receipt of a complete and accurate ASR (App Date) the Access Service Center (ASC) will release a FOC to the customer verbally, manually or electronically within a specified time period. FOC response is traditionally transmitted in same manner ASR was received.
3. Receive time of ASR is adjusted to 8:00 AM CST of the next business day when received on a weekend or holiday.
4. Projects are excluded.

Exclusions

1. OCn
2. Unsolicited FOCs
3. Disconnect ASRs
4. Cancelled ASRs
5. Record ASRs
6. New Cell Sites
7. Projects

Levels of Disaggregation

Special Access

- DS0 both analog and digital
- DS1
- DS3 where facilities exist

Performance Objective

Percent of FOCs Received within Standard

Special Access – DS0 95% within 24 hours
DS1 95% within 24 hours
DS3 ~~TBD~~ 75% within 72 hours

FOC Receipt Distribution - diagnostic

FCC#2 Tariff Remedy

Not Applicable

ORDERING

Measurement: SBC-AIT FOC Receipt Past Due #2

Description
The FOC Receipt Past Due metric tracks all error free ASR submittals that have not been FOC'd within the specified time period, as of the last day of the report period that do not have an open, or outstanding Query/reject.

Calculation Methodology
Percent FOC Receipt Past Due – without open query/reject: Sum of error-free ASR's received without a FOC issued to customer within specified time period divided by the number of FOC's issued within specified time period.

FOC Issuance Past Due – without open query/reject – distribution: **SBC does not support this metric**

Percent FOC Receipt Past Due – with open query/reject: **SBC does not support this metric**

Business Rules
1. The FOC confirmation includes key critical dates and due date is provided to the customer.
2. Upon receipt of a complete and accurate ASR (App Date) the Access Service Center (ASC) will release a FOC to the customer verbally, manually or electronically within a specified time period. FOC response is traditionally transmitted in same manner ASR was received.
3. Receive time of ASR is adjusted to 8:00 AM CST of the next business day when received on a weekend or holiday.
4. Projects are excluded.

Exclusions
OCn
Unsolicited FOCs
Disconnect ASRs
Cancelled ASRs
Record ASRs
New Cell Sites
Projects

Levels of Disaggregation
Special Access
- DS0 both analog and digital
- DS1
- DS3 where facilities exist

Performance Objective
Percent of FOCs Not Issued within Standard
Special Access – DS0 5%
DS1 5%
DS3 25%
FOC Receipt Distribution - diagnostic

FCC#2 Tariff Remedy
Not Applicable

ORDERING

Measurement: SBC-AIT Offered vs. Requested Due Date #3

Description
The Offered versus Requested Due Date metric reflects the degree to which SBC-AIT grants the customer's desired due date (CDDD) when such date is equal to or greater than the published standard interval.

Calculation Methodology
Percent CDDD granted when a standard interval or greater is requested: Sum of error-free ASR's where CDDD of standard interval or greater is granted divided by sum of error-free ASR's where CDDD is standard interval or greater

Offered versus Requested Interval Delta – Distribution: **SBC does not support this metric.**

Business Rules
1. Calculation based on most recent FOC issued by ILEC
2. Days shown are business days Monday to Friday, excluding Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend or holiday, will be calculated with an end date of the previous business day.
3. Projects as defined in the SBC Standard Interval Guide are excluded.

Exclusions
OCn
Unsolicited FOCs
Disconnect ASRs
Cancelled ASRs
Record ASRs
New Cell Sites
Projects

Levels of Disaggregation
Special Access
- DS0 both analog and digital
- DS1
- DS3 where facilities exist

Performance Objective
Diagnostic

FCC#2 Tariff Remedy
Not Applicable

PROVISIONING

Measurement: SBC-AIT On Time Performance to FOC Due Date #4

Description
Percent of orders completed on or before the committed due date with a completion recording date (CRD) in the current measured month. SBC currently measures On Time Performance to FOC Due Date with CNR consideration (CNR's are scored as a "met").

Calculation Methodology

Percent On Time Performance to FOC Due Date – with CNR's counted as met and included in the numerator and denominator: (Total number of orders with a CRD (completion recording date) in he current month in which the Completion Date is on or before the Due Date + orders completed after the due date with a CNR code) divided by (the total number of all orders with a CRD in the current month + orders completed after the Due Date with a CNR code).

Percent On Time Performance to FOC Due Date – without CNR consideration: **SBC does not support this measure.**

Business Rules
1. Measure is based on the most recent error-free ASR sent and associated FOC Due Date sent by SBC-AIT.
2. Calculation is based on channelized and non-channelized orders completed by SBC-AIT.
3. The Completion Date is the date SBC-AIT completes the installation of the circuit as noted in completion notification to customer.
4. Projects are included.
5. The customer provided due date will not be changed by SBC-AIT unless requested and/or agreed to by the customer.
6. A Customer Not Ready (CNR) is defined as a situation beyond SBC-AIT's control that prevents completion of the circuit installation. Includes (bill paying) customer not ready; end user not ready, independent connecting company not ready.

Exclusion
1. Disconnects
2. Canceled orders
3. Record orders
4. Meet point orders (multi-LEC)
5. Orders not completed on due date due to deregulated (T&M) wiring activities

Levels of Disaggregation
Special Access
- DS0 analog and digital
- DS1
- DS3

Performance Objective
Special Access
- DS0 analog and digital 95.0%
- DS1 95.0%
- DS3 95.0%

FCC#2 Tariff Remedy
Installation guarantees, EPAP, MVP

PROVISIONING

Measurement: SBC-AIT Days Late #5

Description
Measures the average number of days SBC-AIT provisions orders past the FOC due date. SBC currently maintains this data for internal diagnostic purposes.

Calculation Methodology

Average Days Late: Sum of the total days beyond the FOC date divided by the number of orders that were completed past the committed date with a measured SBC-AIT missed function code.

Days Late Distribution: **SBC does not support this measure.**

Average Days Late Due to a Lack of ILEC Facilities: **SBC does not support this measure.**

Business Rules
1. Includes add & rearrange orders missed for SBC-AIT reasons.
2. Interval based on business days.
3. Calculations computed at SBC-AIT regional and state level.
4. The customer provided due date will not be changed by SBC-AIT unless requested and/or agreed to by the customer.

Exclusions
1. CNR's
2. Cancels
3. Disconnects
4. Record Orders
5. Delays caused by State Permits and/or Right-of-way issues.

Levels of Disaggregation
Special Access
- DS0
- DS1
- DS3
- OCn

Performance Objective
Diagnostic

FCC#2 Tariff Remedy
Not Applicable

PROVISIONING

Measurement: SBC-AIT Average Intervals – Requested/Offered/Installation #6

Description
This metric tracks ~~and displays the relationship of 3 components of the ordering and provisioning processes. Components include~~ the average number of days the customer is requesting of SBC-AIT to provision service~~. the average interval SBC-AIT offers and the average cycle time. from customer request to completion of the order.~~

Calculation Methodology
Average requested interval: Sum total days from application date (App) to CDDD divided by total number of orders.

Average SBC-AIT Offered Interval: **SBC does not support this metric.**

Average Installation Interval: **SBC does not support this metric.**

Business Rules
1. Calculation based on most recent FOC issued by ILEC
2. Days shown are business days Monday to Friday, excluding Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend or holiday, will be calculated with an end date of the previous business day.
3. Projects as defined in the SBC Standard Interval Guide are excluded.
4. CDDD must be greater than APP date.

Exclusions
OCn
Unsolicited FOCs
Disconnect ASRs
Cancelled ASRs
Record ASRs
Projects

Levels of Disaggregation
Special Access
- DS0 both analog and digital
- DS1
- DS3

Performance Objective
Diagnostic

FCC#2 Tariff Remedy
Not Applicable

PROVISIONING

Measurement: SBC-AIT Past Due Circuits #7

Description
Provides a snapshot of the number of orders past due according to the FOC Due Date. Reported for SBC-AIT delays as well as CLEC/IEC CNR's (separate tracking). SBC currently measures Past Due Orders for internal diagnostic purposes.

Calculation Methodology
Number of circuits past due: Count number of circuits pending beyond the FOC due date separated by SBC and customer delay reasons.

Past Due Circuit Distribution: Number of circuits past due on last day of report period distributed by; 1-5 days; 6-10 days; 11-20 days; 21-30 days; 31-40 days; and >40 days

Percent Cancellations after FOC Due Date: **SBC does not support this metric.**

Business Rules
1. Includes add & rearrange orders pending past due for SBC-AIT reasons.
2. Includes add & rearrange orders pending past due for customer reasons.
3. Based on most recent FOC Due Date.
4. Calculation based on business days.

Exclusions
1. Projects
2. Cancels
3. Disconnects
4. Record orders

Levels of Disaggregation
Special Access
- DS0
- DS1
- DS3

Performance Objective
Diagnostic

FCC#2 Tariff Remedy
Installation guarantees, EPAP, MVP

PROVISIONING

Measurement: SBC-AIT New Installation Trouble Report Rate #8

Description
Percent of ADD orders that receive a customer reported trouble (CR) within 30 calendar days of the order completion date. SBC currently measures New Installation Trouble Report Rate.

Calculation Methodology

Total number of measured CR reports, excluding subsequent reports, where the received date of the report is within 30 days of the Completion Date of the circuit divided by the total number of ADD circuits installed in the report period x 100.

Business Rules
1. Calculation based on number of non-channelized DS3, DS1, DDS and VGPL ADD circuits
2. Calculation is based on customer initiating a trouble report and closed out by SBC-AIT with a measured disposition code.
3. Results complied 1 month in arrears.

Exclusions
1. INF tickets
2. CPE tickets
3. IEC tickets

Levels of Disaggregation
Special Access
- DS0 digital and analog
- DS1
- DS3

Performance Objective
Special Access
- DS0 digital and analog 7.0%
- DS1 6.0%
- DS3 5.0%

FCC#2 Tariff Remedy
Not Applicable

MAINTENANCE AND REPAIR

Measurement: SBC-AIT Failure Frequency #9

Description
Measures the percent of customer reports with a closed date in the current measured month per 100 circuits. SBC currently measures Failure Frequency.

Calculation Methodology

Total number of measured CR reports with a closed date in the current month divided by the number of in-effect (working) circuits.

Business Rules
1. A trouble report is any record used by SBC-AIT for the purposes of tracking related action and disposition of a service or maintenance situation.
2. A trouble is resolved when SBC-AIT service is restored to normal operational parameters and customer acceptance.
3. Only measured trouble reports are used in calculation of result.
4. When more than one measured trouble report is resolved on a specific circuit during the reporting period, each trouble report is counted in the Failure Frequency rate.

Exclusions
1. Test OK's/NTF
2. Canceled trouble tickets
3. Trouble reports closed out to non-measured codes
4. INF tickets
5. SBC generated tickets (employee reports)
6. ~~Multi-LEC~~ Meet point orders (multi-LEC)

Levels of Disaggregation
Special Access
- DS0 analog and digital
- DS1
- DS3

Monthly Performance Objective
Special Access
- DS0 digital and analog 3%
- DS1 2.5%
- DS3 1%

FCC#2 Tariff Remedy
Credit allowance for service interruption, EPAP influence, MVP

MAINTENANCE AND REPAIR

Measurement: SBC-AIT Mean Time To Restore #10

Description
Measures average duration time, expressed in hours and minutes, of measured customer reports with a closed date in the current measured month from the receipt of the report to the time service is restored (excludes no access and delayed maintenance). SBC currently measures Mean Time to Restore.

Calculation Methodology
Mean Time to Restore: Sum of measured duration time for total number of CR measured trouble reports divided by the total number of CR measured trouble reports.

% Out of Service Greater than 24 Hours: **SBC does not support this metric.**

Mean Time to Restore – FOK/TOK: **SBC does not support this metric.**

Business Rules
1. Calculation based on measured duration time.
2. Calculation based on measured customer trouble reports.
3. Elapsed time is measured on a 24-hour, seven-day per-week basis, without consideration of weekends or holidays.

Exclusions
1. INF
2. CPE
4. Customer delay time
5. No access time
6. Delayed maintenance time
7. Non-measured codes
8. IEC tickets
9. ~~Multi-LEC circuits~~ Meet point orders (multi-LEC)

Levels of Disaggregation
Special Access
- DS0 analog and digital
- DS1
- DS3

Performance Objective
Special Access MTTR
- DS0 digital and analog 5.0 hours
- DS1 5.0 hours
- DS3 3.0 hours

FCC#2 Tariff Remedy
Credit allowance for service interruption, EPAP influence, MVP influence

MAINTENANCE AND REPAIR

Measurement: SBC-AIT Repeat Trouble Report Rate #11

Description
Measures percent of measured CR reports with a closed date within the current month which are received within 30 calendar days of a previous report. Calculated from the restored date of the original report. SBC currently measures Repeat Trouble Report Rate.

Calculation Methodology

Total number of measured CR reports with a closed date in the current month and received within 30 days of a previous measured CR report divided by the total number of measured CR reports with a closed date in the current month x 100.

Business Rules
1. A trouble report is any record used by SBC-AIT for the purposes of tracking related action and disposition of a service or maintenance situation.
2. A trouble is resolved when SBC-AIT when service is restored to normal operational parameters.
3. Only measures trouble reports are used in calculation of result.
4. Calculation based on the 1st report categorized as original, each subsequent measured trouble code would be categorized as a repeat if initiated within 30 days of 1st report.

Exclusions
1. Canceled reports
2. CPE/IEC
3. INF
4. Non-measured reports
5. SBC generated reports (employee reports)

Levels of Disaggregation
Special Access
- DS0 analog and digital
- DS1
- DS3

Performance Objective
Special Access
- DS0 digital and analog 15.0%
- DS1 12.0%
- DS3 10.0%

Tariff Remedy
Credit allowance for service interruption, EPAP influence

Attachment 1

FCC #2 Tariff Remedies

Plan	Brief Description	Section
Installation Interval Guarantee	Credits the non-recurring charges for installation when SBC-AIT fails to meet the FOC installation date.	7.4.15
Credit Allowance for Service Interruptions	Credits for individual circuits that are out-of-service from 1 minute to 24 hours based on the service type sold from the interstate tariff. Credit cannot exceed 100% of the monthly rate.	2.4.4
Enhanced Performance Assurance Plan (EPAP)	Credits provided to customers when AIT-SBC fails to achieve predetermined objectives for DS0 &/or DS1 provisioning intervals, on time performance, trouble reports restored within 3 hours.	7.4.16
Managed Value Plan (MVP)	MVP is a qualified access discount plan providing customers with billing discounts for their commitment to maintain a predetermined monthly recurring billing amount for 5 years. SBC-AIT is contractually obligated to credit monies back to the customer when specific, predetermined, provisioning and maintenance service levels are not achieved.	19.3

Attachment 2

SBC Ameritech Provisioning Intervals as proposed in pending FCC #2 filing

Service Type	Quantity	Provisioning Interval
DS1	1 –4 circuits	7 business days
DS1	>5 circuits	Negotiated project
DS0 analog & digital	1 – 12 circuits	10 business days
DS0 analog & digital	>13 circuits	Negotiated project
DS0 multi-point	3 – 6 legs	10 business days
DS0 multi-point	>7 legs	Negotiated project

Notes:
1) A project (negotiated) is defined as a customer ordering the specified quantity of services terminating at either the same "A" or "Z" location.
2) Intervals do not apply for any services associated with new cell sites under construction.
3) Intervals do not apply to multi-LEC orders.
4) Provisioning Interval commences upon receipt of error-free ASR.

Additionally, although not part of the pending tariff application, DS3 services have the following provisioning interval as detailed in the SBC Ameritech Interval Guide.

Service Type	Quantity	Provisioning Interval
DS3	1 circuit	15 business days if facilities exist
DS3	1 circuit	Negotiated if no facilities in place
DS3	>1 circuit	Negotiated project

Note:
1) A project (negotiated) is defined as a customer ordering the specified quantity of services terminating at either the same "A" or "Z" location.
2) Intervals do not apply for any services associated with new cell sites under construction.
3) Intervals do not apply to multi-LEC orders.
4) Provisioning Interval commences upon receipt of error-free ASR.

Glossary of Terms

ASR = Access Service Request

CLEC = Competitive Local Exchange Company

CNR = Customer Not Ready

CPE = Customer Provided Equipment

CRD = Completion Recording Date

FOC = Firm Order Confirmation

FOK = Found Okay

IEC = Inter-exchange Carrier

ILEC = Incumbent Local Exchange Company

INF = Informational Ticket

NTF = No Trouble Found

SBC-AIT = SBC Ameritech

T&M = Time and Materials

TOK = Test Okay

IURC Cause No. 41657

Exhibit 4

SBC Ameritech Proposed Special Access Service Objectives

Version ~~1.2~~ 1.3

~~4/10/2002~~

CLECs' redlines 5/10/02

SBC Ameritech Proposed Special Access Service Objectives

TABLE OF CONTENTS

SBC Ameritech Proposed Special Access Service Objectives

Overview

The purpose of this document is to define SBC Ameritech service performance objectives used to measure the quality and timeliness of special access services (does not include switched services) provided to customers of SBC Ameritech. This document has been developed to assist in conducting business-to-business conversations with SBC's Access Customers. It does not represent a willingness to endorse or support regulatory efforts to invoke Performance Measures and/or remedies for Special Access Services. These objectives cover the essential aspects or Ordering, Provisioning and Maintenance & Repair activities in the 5 SBC Ameritech states (Illinois, Michigan, Indiana, Ohio & Wisconsin). It is SBC Ameritech's intent to track each proposed Provisioning and Maintenance performance metric at the regional and state level. Ordering metrics will be reported exclusively at the Regional level. Additionally, SBC Ameritech shall ~~is only willing to~~ measure and report the performance of specific special access services/products for any CLEC or Carrier that has an ~~when predetermined~~ in-service ~~quantities exist - allowing for a statistically valid result to be calculated. Specifically, the in-service~~ inventory of any service/product in the aggregate of ~~must be~~ 50 or greater circuits. SBC Ameritech shall measure and report monthly special access performance for CLECs and/or Carriers that meet the in-service inventory quantities regardless of, monthly provisioning order volume or ~~of 20 or greater; and~~ measured trouble ticket volume. ~~of 20 or greater.~~

Our intent is to respond to the proposed document entitled "Joint Competitive Industry Group Proposal (JCIG ~~JIP~~) ILEC Performance Measurements and Standards in the Ordering, Provisioning and Maintenance & Repair of Access Services – version 1.1" dated January 18, 2002. As detailed in this document, SBC Ameritech agrees to measure 11 of the 11 proposed JCIG ~~JIP~~ measures.

SBC Ameritech further believes it important to review the various existing FCC #2 tariff remedies which are noted on each objective as applicable. Attachment #1 of this document provides a description of these remedies.

Attachment #2 details SBC Ameritech's standard interval offerings by service/product type.

ORDERING

Measurement: SBC-AIT FOC Timeliness #1

Description

The Firm Order Confirmation (FOC) is SBC-AIT's response to an access customer's Access Service Request (ASR), whether an initial or supplement ASR, that provides the customer with the specific Due Date on which the requested circuit or circuits will be installed. The expectation is that the ILEC will conduct a minimum of an electronic facilities check to ensure due dates delivered in FOCs can be relied upon. The performance standard ~~objective~~ for FOCs issued within the standard interval is expressed as a percentage of the total FOCs issued during the reporting period. SBC currently measures FOC timeliness.

Calculation Methodology

Percent Meeting Objective: Total number of error-free ASRs that are FOC'd within the specified time period divided by the total number of error-free ASRs FOC'd to the customer.

FOC Receipt – Distribution: (FOC issued date – ASR submitted date) for each FOC issued during reporting period, distributed by: 0 day, 1 day, 2 days…10 days, and >10 days.

ASR's withdrawn at ILEC Request due to a lack of ILEC facilities or otherwise: It is NOT SBC-AIT's business practice to request a customer cancel or withdraw a valid ASR for any reason. As such, SBC does not support this metric.

Business Rules

1. The FOC confirmation includes key critical dates and due date is provided to the customer.
2. Upon receipt of a complete and accurate ASR (App Date) the Access Service Center (ASC) will release a FOC to the customer verbally, manually or electronically within a specified time period. FOC response is traditionally transmitted in same manner ASR was received.
3. Receive time of ASR is adjusted to 8:00 AM CST of the next business day when received on a weekend or holiday.
4. Counts are based on each instance of a FOC received from SBC-AIT. If one or more Supplement ASRs are issued to correct or changes a request, each corresponding FOC, which is received during the reporting period, Is counted and measured.

~~4.Projects are excluded.~~

Exclusions

1. ~~OCn~~
2. Unsolicited FOCs
3. Disconnect ASRs
4. Cancelled ASRs
5. Record ASRs
6. ~~New Cell Sites~~
7. ~~Projects~~

Levels of Disaggregation

Special Access

- DS0 both analog and digital
- DS1
- DS3 ~~where facilities exist~~
- OCn

Performance Standard ~~Objective~~

Percent of FOCs Received within Standard

Special Access – DS0 => 95~~8~~% within 2 business days ~~24 hours~~

DS1=> 95~~8~~% within 2 business days ~~24 hours~~

DS3 => ~~TBD~~ ~~75%~~ 98% within 5 business days ~~72 hours~~
OCn - ICB (individual case basis)

FOC Receipt Distribution - diagnostic

FCC#2 Tariff Remedy

Not Applicable (Although this metric is not currently remedied pursuant to SBC-AIT's FCC #2 Tariff, it is not intended, nor should it be construed by SBC-AIT that concurrence by CLECs and Carriers has been reached that no remedy applies)

ORDERING

Measurement: SBC-AIT FOC Receipt Past Due #2

Description
The FOC Receipt Past Due metric tracks all error free ASR submittals that have not been FOC'd within the specified time period, as of the last day of the report period that do not have an open, or outstanding Query/reject.

Calculation Methodology
Percent FOC Receipt Past Due – without open query/reject: Sum of error-free ASR's received without a FOC issued to customer within specified time period divided by the number of FOC's issued within specified time period.

FOC Issuance Past Due – without open query/reject – distribution: ~~**SBC does not support this metric**~~

Percent FOC Receipt Past Due – with open query/reject: ~~**SBC does not support this metric**~~

Business Rules
1. The FOC confirmation includes key critical dates and due date is provided to the customer.
2. Upon receipt of a complete and accurate ASR (App Date) the Access Service Center (ASC) will release a FOC to the customer verbally, manually or electronically within a specified time period. FOC response is traditionally transmitted in same manner ASR was received.
3. Receive time of ASR is adjusted to 8:00 AM CST of the next business day when received on a weekend or holiday.
4. Projects are included. SBC-AIT has published circuit quantities that comprise a project and therefore should not alter the need to ensure that service is provided within expected intervals.
~~4. Projects are excluded.~~

Exclusions
~~OCn~~
Unsolicited FOCs
Disconnect ASRs
Cancelled ASRs
Record ASRs
~~New Cell Sites~~
~~Projects~~

Levels of Disaggregation
Special Access
- DS0 both analog and digital
- DS1
- DS3 ~~where facilities exist~~
- OCn

Performance Standard ~~Objective~~
Percent of FOCs Not Issued within Standard
Special Access – ~~DS0 5%~~ < 2% FOC Receipt past due
~~DS1 5%~~
~~DS3 25%~~
FOC Receipt Past Due – Without Open Query/Reject - Distribution – diagnostic

Percent FOC Receipt Past Due – With Open Query/Reject – Diagnostic

FCC#2 Tariff Remedy

Not Applicable (Although this metric is not currently remedied pursuant to SBC-AIT's FCC #2 Tariff, it is not intended, nor should it be construed by SBC-AIT that concurrence by CLECs and Carriers has been reached that no remedy applies)

ORDERING

Measurement: SBC-AIT Offered vs. Requested Due Date #3

Description
The Offered versus Requested Due Date metric reflects the degree to which SBC-AIT grants the customer's desired due date (CDDD) when such date is equal to or greater than the published standard interval. A distribution of the delta, the difference between the CDDD and the offered date, for these FOCs is required for diagnostic purposes.

Calculation Methodology
Percent CDDD granted when a standard interval or greater is requested: Sum of error-free ASR's where CDDD of standard interval or greater is granted divided by sum of error-free ASR's where CDDD is standard interval or greater

Offered versus Requested Interval Delta – Distribution: Distributed by 0 Days, 1-5 Days, 6-10 Days, 11-20 Days, 21-30 Days, 31-40 Days, and > 40 Days.
~~**SBC does not support this metric.**~~

Business Rules
1. Calculation based on most recent FOC issued by ILEC
2. Days shown are business days Monday to Friday, excluding Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend or holiday, will be calculated with an end date of the previous business day.
3. Projects as defined in the SBC Standard Interval Guide are included. ~~excluded.~~

Exclusions
~~OCn~~
Unsolicited FOCs
Disconnect ASRs
Cancelled ASRs
Record ASRs
~~New Cell Sites~~
~~Projects~~

Levels of Disaggregation
Special Access
- DS0 both analog and digital
- DS1
- DS3 ~~where facilities exist~~
- OCn

Performance Standard ~~Objective~~
Percent Offered with CDDD => SBC-AIT stated interval = 100%
Offered versus Requested Interval Delta – Distribution - Diagnostic

FCC#2 Tariff Remedy
Not Applicable (Although this metric is not currently remedied pursuant to SBC-AIT's FCC #2 Tariff, it is not intended, nor should it be construed by SBC-AIT that concurrence by CLECs and Carriers has been reached that no remedy applies)

PROVISIONING

Measurement: SBC-AIT On Time Performance to FOC Due Date #4

Description

Percent of orders completed on or before the committed due date with a completion recording date (CRD) in the current measured month. Customer Not Ready (CNR) situations may result in an installation delay. SBC-AIT shall ~~currently~~ measures On Time Performance to FOC Due Date with CNR consideration (CNR's are scored as a "met"), and without CNR consideration.

Calculation Methodology

Percent On Time Performance to FOC Due Date – with CNR's counted as met and included in the numerator and denominator: (Total number of orders with a CRD (completion recording date) in the current month in which the Completion Date is on or before the Due Date + orders completed after the due date with a CNR code) divided by (the total number of all orders with a CRD in the current month + orders completed after the Due Date with a CNR code).

Percent On Time Performance to FOC Due Date – without CNR consideration: ~~**SBC does not support this measure.**~~

Business Rules

1. Measure is based on the most recent error-free ASR sent and associated FOC Due Date sent by SBC-AIT.
2. Calculation is based on channelized and non-channelized orders completed by SBC-AIT.
3. The Completion Date is the date SBC-AIT completes the installation of each ~~the~~ circuit listed on the ASR as noted in completion notification to customer.
4. Projects are included.
5. The customer provided due date will not be changed by SBC-AIT unless requested and/or agreed to by the customer.
6. A Customer Not Ready (CNR) is defined as a situation beyond SBC-AIT's control that prevents completion of the circuit installation. Includes (bill paying) customer not ready; end user not ready, independent connecting company not ready.

Exclusion

1. Disconnects
2. Canceled orders
3. Record orders
4. Meet point orders (multi-LEC)
5. Orders not completed on due date due to deregulated (T&M) wiring activities
6. Unsolicited FOCs

Levels of Disaggregation

Special Access

- DS0 analog and digital
- DS1
- DS3
- OCn

Performance Standard ~~Objective~~

Special Access – Percent On Time to FOC Due Date – With CNR consideration

- ~~DS0 analog and digital 95.0%~~ => 98% On Time

~~□DS1 95.0%~~

~~□DS3 95.0%~~

Percent On Time to FOC Due Date – Without CNR consideration - Diagnostic

FCC#2 Tariff Remedy

Installation guarantees, EPAP, MVP (Although this metric has certain remedies available pursuant to SBC-AIT's FCC #2 Tariff, it is not intended, nor should it be construed by SBC-AIT that concurrence by CLECs and Carriers has been reached that the level of remedy is appropriate to incent improved service delivery performance)

PROVISIONING

Measurement: SBC-AIT Days Late #5

Description

Measures the magnitude of the delay, both in average number of days SBC-AIT provisions orders past the FOC due date, and distribution for those circuits not completed on the FOC Due Date where the delay was not a result of a verifiable CNR situation. A breakdown of delay days caused by SBC-AIT lack of facilities is required for diagnostic purposes. ~~SBC currently maintains this data for internal diagnostic purposes.~~

Calculation Methodology

Average Days Late: Sum of the total days beyond the FOC date divided by the number of orders that were completed past the committed date with a measured SBC-AIT missed function code.

Days Late Distribution: ~~**SBC does not support this measure.**~~ Circuit Completion Date – SBC-AIT Committed Due Date (for all circuits Completed Beyond SBC-AIT Committed Due Date without a CNR code) distributed by 1 day, 2-5 days, 6-10 days, 11-20 days, 21-30 days, 31-40 days, and > 40 days.

Average Days Late Due to a Lack of ILEC Facilities: ~~**SBC does not support this measure.**~~ Σ [Circuit Completion Date – SBC-AIT Committed Due Date (for all Circuits Completed beyond SBC Committed Due Date without a CNR code and due to lack of SBC Facilities)] / (Count of Circuits Completed beyond the SBC Committed due date without a CNR code and due to SBC lack of facilities)

Business Rules

1. Includes add & rearrange orders missed for SBC-AIT reasons.
2. Interval based on business days.
3. Calculations computed at SBC-AIT regional and state level.
4. The customer provided due date will not be changed by SBC-AIT unless requested and/or agreed to by the customer.
5. A Customer Not Ready (CNR) is defined as a verifiable situation beyond the normal control of SBC-AIT that prevents SBC from completing the order, including the following: CLEC or IXC Carrier is not ready; end user is not ready; connecting company, or CPE supplier is not ready. SBC-AIT must ensure that established procedures are followed to notify the CLEC or IXC Carrier of a CNR situation and allow a reasonable period of time for the CLEC or IXC Carrier to correct the situation.

Exclusions

1. Verified CNR's
2. Cancels
3. Disconnects
4. Record Orders
5. Delays caused by State Permits and/or Right-of-way issues.
6. Unsolicited FOCs

Levels of Disaggregation

Special Access

- DS0
- DS1
- DS3
- OCn

Performance Standard ~~Objective~~

Average Days Late < 3.0 Days

Days Late Distribution - Diagnostic
Average Days Late Due to a Lack of SBC-AIT Facilities - Diagnostic

FCC#2 Tariff Remedy

Not Applicable (Although this metric is not currently remedied pursuant to SBC-AIT's FCC #2 Tariff, it is not intended, nor should it be construed by SBC-AIT that concurrence by CLECs and Carriers has been reached that no remedy applies)

PROVISIONING

Measurement: SBC-AIT Average Intervals – Requested/Offered/Installation #6

Description

This metric tracks the three important aspects of the provisioning process and displays them in relation to each other. ~~and displays the relationship of 3 components of the ordering and provisioning processes. Components include~~ Tthe average CLEC or IXC Carrier Requested Interval, the Average SBC-AIT Offered Interval, and the Average Installation Interval, provide a comprehensive view of provisioning, with the ultimate goal of having these three intervals equivalent. ~~number of days the customer is requesting of SBC-AIT to provision service., the average interval SBC-AIT offers and the average cycle time, from customer request to completion of the order.~~

Calculation Methodology

Average requested interval: Sum total days from application date (App) to CDDD divided by total number of orders.

Average SBC-AIT Offered Interval: ~~**SBC does not support this metric.**~~ Sum (FOC Due Date – ASR Sent Date) / Total Circuits Completed during the reporting period.

Average Installation Interval: ~~**SBC does not support this metric.**~~ Sum (SBC-AIT Completion Date – ASR Sent Date) / Total Circuits Completed during reporting period.

Business Rules

1. Calculation based on most recent FOC issued by ILEC
2. Days shown are business days Monday to Friday, excluding Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend or holiday, will be calculated with an end date of the previous business day.
3. Projects as defined in the SBC Standard Interval Guide are included ~~excluded~~.
4. CDDD must be greater than APP date.
5. The Average Installation interval includes all completions.

Exclusions

~~OCn~~
Unsolicited FOCs
Disconnect ASRs
Cancelled ASRs
Record ASRs
~~Projects~~

Levels of Disaggregation

Special Access

- DS0 both analog and digital
- DS1
- DS3
- OCn

Performance Standard ~~Objective~~

Average Requested Interval – Diagnostic
Average Offered Interval – Diagnostic
Average Installation Interval - Diagnostic

FCC#2 Tariff Remedy

Not Applicable (This metric is proposed by CLECs and Carriers as a diagnostic measure only at this time)

PROVISIONING

Measurement: SBC-AIT Past Due Circuits #7

Description

Provides a snapshot of the number of orders past due according to the FOC Due Date. The count is taken from those circuits that have received an FOC due date but the date has passed. Reported for SBC-AIT delays as well as CLEC/IEC CNR's (separate tracking), with a breakdown for diagnostic purposes , of past due circuits due to SBC-AIT lack of facilities . A diagnostic measure, Percent Cancellations After FOC due date, is included to show a percent of all cancellations processed during the reporting period where the cancellation took place after the FOC due date had passed. ~~SBC currently measures Past Due Orders for internal diagnostic purposes.~~

Calculation Methodology

Number of circuits past due: [(Count of all ~~number of~~ circuits pending at the end of the reporting period > 5 days beyond the FOC due date separated by SBC and customer delay reasons) / (Total pending orders past FOC due date, for all missed reasons, at the end of the reporting period)] X 100.

Past Due Circuit Distribution: Number of circuits past due on last day of report period distributed by; 1-5 days; 6-10 days; 11-20 days; 21-30 days; 31-40 days; and >40 days

Percent Cancellations after FOC Due Date: ~~**SBC does not support this metric.**~~ [Count of all Circuits cancelled during reporting period, that were past due date at the end of the previous reporting period, where (Date Cancelled > FOC due date) / (Total circuits past due at the end of the previous reporting period)] X 100.

Business Rules

1. Includes add & rearrange orders pending past due for SBC-AIT reasons.
2. Includes add & rearrange orders pending past due for customer reasons.
3. Based on most recent FOC Due Date.
4. Calculation based on business days.

Exclusions

~~1.Projects~~
~~2.~~1. Cancels
~~3.~~2. Disconnects
~~4.~~3. Record orders
4. Unsolicited FOCs

Levels of Disaggregation

Special Access

- DS0
- DS1
- DS3
- OCn

Performance Standard ~~Objective~~

Percent Past Due Circuits – Total SBC-AIT Reasons - < 3% > 5 days beyond FOC due date
Percent Past Due Circuits – Due to SBC lack of facilities – Diagnostic
Percent Past Due Circuits – Total CLEC/Carrier Reasons – Diagnostic
Past Due Circuits Distribution – Diagnostic
Percent Cancelled After FOC due date - Diagnostic

FCC#2 Tariff Remedy

Installation guarantees, EPAP, MVP (Although SBC-AIT states this metric is currently remedied pursuant to their FCC #2 Tariff, it is not intended, nor should it be construed by SBC-AIT that concurrence by CLECs and Carriers has been reached in this regard)

PROVISIONING

Measurement: SBC-AIT New Installation Trouble Report Rate #8

Description
Percent of ADD orders that receive a customer reported trouble (CR) within 30 calendar days of the order completion date. SBC currently measures New Installation Trouble Report Rate.

Calculation Methodology

Total number of measured CR reports, excluding subsequent reports, where the received date of the report is within 30 days of the Completion Date of the circuit divided by the total number of ADD circuits installed in the report period x 100.

Business Rules
1. Calculation based on number of channelized and non-channelized DS3, DS1, DDS and VGPL ADD circuits
2. Calculation is based on customer initiating a trouble report and closed out by SBC-AIT with a measured disposition code.
3. Results complied 1 month in arrears.

Exclusions
1. INF tickets
2. CPE tickets
3. IEC tickets
4. Trouble tickets that are canceled at the CLEC's or IXC Carrier's request

Levels of Disaggregation
Special Access
- DS0 digital and analog
- DS1
- DS3
- OCn

Performance Standard ~~Objective~~
Special Access
- New Installation Trouble Report Rate ~~DS0 digital and analog~~ 1 per 100 circuits installed ~~7.0%~~
  ~~DS1 6.0%~~ If SBC-AIT can not support this performance standard, then an interim performance ramp that enables them to reach this objective will be considered.
  ~~DS3 5.0%~~

FCC#2 Tariff Remedy
Not Applicable (Although this metric is not currently remedied pursuant to SBC-AIT's FCC #2 Tariff, it is not intended, nor should it be construed by SBC-AIT that concurrence by CLECs and Carriers has been reached that no remedy applies)

MAINTENANCE AND REPAIR

Measurement: SBC-AIT Failure Frequency #9

Description

Measures the percent of customer reports with a closed date in the current measured month per 100 circuits, and then is annualized by multiplying by 12 months. SBC currently measures Failure Frequency.

Calculation Methodology

Total number of measured CR reports with a closed date in the current month divided by the number of in-effect (working) circuits X 100.

Business Rules

1. A trouble report is any record used by SBC-AIT for the purposes of tracking related action and disposition of a service or maintenance situation.
2. A trouble is resolved when SBC-AIT service is restored to normal operational parameters and customer acceptance.
3. Only measured trouble reports are used in calculation of result.
4. When more than one measured trouble report is resolved on a specific circuit during the reporting period, each trouble report is counted in the Failure Frequency rate.

Exclusions

1. Test OK's/NTF
2. Canceled trouble tickets
3. Trouble reports closed out to non-measured codes
4. INF tickets
5. SBC generated tickets (employee reports)
6. ~~Multi-LEC~~ Meet point orders (multi-LEC)

Levels of Disaggregation

Special Access

- Below DS3 (DS0 analog and digital & DS1)
- ~~DS1~~
- DS3 & Above (DS3 & OCn)

Monthly Performance Standard ~~Objective~~

Special Access

- Below DS3 ~~DS0 digital and analog 3%~~ <= 10%
- DS3 and Above ~~DS1 2.5%~~ <= 10%
- ~~DS3 1%~~

FCC#2 Tariff Remedy

Credit allowance for service interruption, EPAP influence, MVP MVP (Although SBC-AIT states this metric is currently remedied pursuant to their FCC #2 Tariff, it is not intended, nor should it be construed by SBC-AIT that concurrence by CLECs and Carriers has been reached in this regard)

MAINTENANCE AND REPAIR

Measurement: SBC-AIT Mean Time To Restore #10

Description
Measures average duration time, expressed in hours and minutes, of measured customer reports with a closed date in the current measured month from the receipt of the report to the time service is restored (excludes no access and delayed maintenance). A breakdown of the percent of Out of Service troubles greater than 3 hours, and the Mean Time to Restore troubles with FOK/TOK is required for diagnostic purposes. SBC currently measures Mean Time to Restore.

Calculation Methodology
Mean Time to Restore: Sum of measured duration time for total number of CR measured trouble reports divided by the total number of CR measured trouble reports.

% Out of Service Greater than ~~24~~ 3 Hours: ~~**SBC does not support this metric.**~~ Total number of measured CR reports with a duration of <= 3 hours in the current report period divided by the total number of measured CR reports with a closed date in the current report period. **SBC-AIT previously proposed this metric as PM 12 in SASO v1.1 dated 2/8/02.**

Mean Time to Restore – FOK/TOK: ~~**SBC does not support this metric.**~~ $\sum$ [(Date and time of trouble ticket resolution closed to the CLEC or IXC Carrier – Date and time of Trouble ticket referred to SBC-AIT) – (Customer Hold Times)] / [(count of trouble tickets resolved in reporting period as FOK/TOK)]

Business Rules
1. Calculation based on measured duration time, but excludes delayed maintenance time resulting from verifiable situations of no access to the end user's premises, or other CLEC or IXC Carrier caused delays, such as holding the ticket open for monitoring, is deducted from the total resolution interval.
2. Calculation based on measured customer trouble reports.
3. Elapsed time is measured on a 24-hour, seven-day per-week basis, without consideration of weekends or holidays.
4. A trouble is "resolved" when SBC-AIT issues notice to CLEC or IXC Carrier that the customer's service is restored to normal operating parameters.

Exclusions
1. INF
2. CPE
4. ~~3.~~ Customer delay time
5. ~~4.~~ No access time
6. ~~**Delayed maintenance time**~~
7. ~~5.~~ Non-measured codes
8. ~~6.~~ IEC tickets
9. ~~7. Multi-LEC circuits~~ Meet point orders (multi-LEC)

Levels of Disaggregation
Special Access
- Below DS3 (DS0 analog and digital & DS1)
- DS3 & Above (DS3 & OCn) ~~DS1~~

~~DS3~~

Performance Standard ~~Objective~~
Special Access MTTR
- ~~□~~Mean Time to Repair – Below DS3 <= 2 ~~DS0 digital and analog 5.0~~ hours

~~□DS1 5.0 hours~~ DS3 & Above <= 1 hour
% OOS > 3 hours – Diagnostic
Mean Time to Repair – FOK/TOK – Diagnostic
~~□DS3 3.0 hours~~

FCC#2 Tariff Remedy
Credit allowance for service interruption, EPAP influence, MVP influence (Although SBC-AIT states this metric is currently remedied pursuant to their FCC #2 Tariff, it is not intended, nor should it be construed by SBC-AIT that concurrence by CLECs and Carriers has been reached in this regard)

MAINTENANCE AND REPAIR

Measurement: SBC-AIT Repeat Trouble Report Rate #11

Description

Measures percent of measured CR reports with a closed date within the current month ~~which~~ that are received within 30 calendar days of a previous report. Calculated from the restored date of the original report. SBC currently measures Repeat Trouble Report Rate.

Calculation Methodology

Total number of measured CR reports with a closed date in the current month and received within 30 days of a previous measured CR report divided by the total number of measured CR reports with a closed date in the current month x 100.

Business Rules

1. A trouble report is any record used by SBC-AIT for the purposes of tracking related action and disposition of a service or maintenance situation.
2. A trouble is resolved when SBC-AIT when service is restored to normal operational parameters.
3. Only measures trouble reports are used in calculation of result.
4. Calculation based on the 1st report categorized as original, each subsequent measured trouble code would be categorized as a repeat if initiated within 30 days of 1st report.
5. If a trouble ticket was closed out previously with the disposition code classifying it as FOK/TOK/CPE/IXC, then the second trouble must be counted as a repeat trouble report if it is resolved to SBC-AIT reasons.

Exclusions

1. Canceled reports
2. CPE/IEC
3. INF
4. Non-measured reports
5. SBC generated reports (employee reports)

Levels of Disaggregation

Special Access

- Below DS3 (DS0 analog and digital & DS1)
- DS 3 & Above (DS3 & OCn) ~~DS1~~

~~DS3~~

Performance Standard ~~Objective~~

Special Access

- Below DS3 <= ~~DS0 digital and analog 15.0%~~ 6%
- DS3 & Above <= 3% ~~DS1 12.0%~~

~~DS3 10.0%~~

Tariff Remedy

Credit allowance for service interruption, EPAP influence (Although SBC-AIT states this metric is currently remedied pursuant to their FCC #2 Tariff, it is not intended, nor should it be construed by SBC-AIT that concurrence by CLECs and Carriers has been reached in this regard)

Attachment 1

FCC #2 Tariff Remedies

Plan	Brief Description	Section
Installation Interval Guarantee	Credits the non-recurring charges for installation when SBC-AIT fails to meet the FOC installation date.	7.4.15
Credit Allowance for Service Interruptions	Credits for individual circuits that are out-of-service from 1 minute to 24 hours based on the service type sold from the interstate tariff. Credit cannot exceed 100% of the monthly rate.	2.4.4
Enhanced Performance Assurance Plan (EPAP)	Credits provided to customers when AIT-SBC fails to achieve predetermined objectives for DS0 &/or DS1 provisioning intervals, on time performance, trouble reports restored within 3 hours.	7.4.16
Managed Value Plan (MVP)	MVP is a qualified access discount plan providing customers with billing discounts for their commitment to maintain a predetermined monthly recurring billing amount for 5 years. SBC-AIT is contractually obligated to credit monies back to the customer when specific, predetermined, provisioning and maintenance service levels are not achieved.	19.3

Attachment 2

SBC Ameritech Provisioning Intervals as proposed in pending FCC #2 filing

Service Type	Quantity	Provisioning Interval
DS1	1 –4 circuits	7 business days
DS1	>5 circuits	Negotiated project
DS0 analog & digital	1 – 12 circuits	10 business days
DS0 analog & digital	>13 circuits	Negotiated project
DS0 multi-point	3 – 6 legs	10 business days
DS0 multi-point	>7 legs	Negotiated project

Notes:
1) A project (negotiated) is defined as a customer ordering the specified quantity of services terminating at either the same "A" or "Z" location.
2) Intervals do not apply for any services associated with new cell sites under construction.
3) Intervals do not apply to multi-LEC orders.
4) Provisioning Interval commences upon receipt of error-free ASR.

Additionally, although not part of the pending tariff application, DS3 services have the following provisioning interval as detailed in the SBC Ameritech Interval Guide.

Service Type	Quantity	Provisioning Interval
DS3	1 circuit	15 business days if facilities exist
DS3	1 circuit	Negotiated if no facilities in place
DS3	>1 circuit	Negotiated project

Note:
1) A project (negotiated) is defined as a customer ordering the specified quantity of services terminating at either the same "A" or "Z" location.
2) Intervals do not apply for any services associated with new cell sites under construction.
3) Intervals do not apply to multi-LEC orders.
4) Provisioning Interval commences upon receipt of error-free ASR.

Glossary of Terms

ASR = Access Service Request

CLEC = Competitive Local Exchange Company

CNR = Customer Not Ready

CPE = Customer Provided Equipment

CRD = Completion Recording Date

FOC = Firm Order Confirmation

FOK = Found Okay

IEC = Inter-exchange Carrier

ILEC = Incumbent Local Exchange Company

INF = Informational Ticket

NTF = No Trouble Found

SBC-AIT = SBC Ameritech

T&M = Time and Materials

TOK = Test Okay